

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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: UNITED STATES OF AMERICA, :
: :
: Plaintiff, : **PROPOSED DISCOVERY PLAN**
: :
: - against - : Civil Action No.
: CV-08-3834
: :
: 75 MAIN AVENUE OWNERS CORP, ET AL., : (SEYBERT, J.)
: (WALL, M.J.)
: Defendants. :
: :
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PURSUANT TO THE ORDER OF THE HONORABLE WILLIAM D. WALL, UNITED STATES MAGISTRATE JUDGE, filed on February 22, 2009, the parties respectfully submit this Proposed Discovery Plan:

Deadline for amendment of the pleadings
without leave of court or joinder of
additional parties: June 5, 2009

Deadline for completion of fact discovery: August 7, 2009

Deadline for completion of expert discovery: October 5, 2009

Deadline to make dispositive motions: Nov. 2, 2009

Dated: Brooklyn, NY
February 24, 2009

Dated: Malverne, NY
February 24, 2009

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